

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

SENIOR OPPORTUNITY FUND
OPERATIONS – I LLC, and
OPCO THAL LLC
Plaintiffs,

Case No.: 1:22-cv-01008-WCG

v.
ASSISTED LIVING BY HILLCREST LLC,
AMY DOOLITTLE DORO,
JACKEY DEY, and
CAPITAL CREDIT UNION SERVICE CORP.,
Defendants.

DEFENDANT CAPITAL CREDIT UNION'S CROSS-CLAIM

Defendant Capital Credit Union (“Capital”), incorrectly named as “Capital Credit Union Service Corp.,” by its attorneys, Litchfield Cavo LLP, pursuant to Fed. R. Civ. P. 13(g), for its Cross-Claim against Defendants Assisted Living by Hillcrest LLC, Amy Doolittle Doro, and Jackey Day (collectively, “ALH”), pleads as follows.

1. Capital realleges and incorporates by reference the allegations contained in Plaintiffs’ First Amended Complaint as modified by the admissions, denials, and assertions contained within Capital’s Answer and Affirmative Defenses.

2. In the event Capital is found liable to Plaintiffs and is required to make any payment to Plaintiffs based on said liability, Capital is entitled to equitable indemnification from ALH as provided for by Wisconsin law, including *Fleming v. Threshermen’s Mut. Ins. Co.*, 131 Wis. 2d 123, 388 N.W.2d 908 (1986).

Dated this 16th day of June 2023.

LITCHFIELD CAVO LLP
Attorneys for Defendant Capital Credit Union

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